



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 15, 2025

By ECF

The Hon. Margaret M. Garnett
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *New York Immigration Coalition, et al. v. Donald J. Trump, et al.*, 25 Civ. 1309 (MMG)

Dear Judge Garnett:

This Office represents the defendants (“Defendants”) in the above-referenced matter. I write respectfully to request an extension of Defendants’ time to respond to Plaintiffs’ motion for a preliminary injunction (ECF Nos. 19-24), from Friday, April 18, 2025 until ten days after the Court rules on Defendants’ pending motion for a stay in this case (ECF Nos. 30, 31).¹ As discussed in Defendants’ motion for a stay, the Executive Order Plaintiffs are challenging in this litigation – Executive Order 14160, Protecting the Meaning and Value of American Citizenship – is currently the subject of three nationwide injunctions. Furthermore, the Government has sought an expedited appeal in each of those cases and the parties may seek further review in the U.S. Supreme Court. Accordingly, granting this extension would not prejudice Plaintiffs and would serve the interests of judicial economy by avoiding duplicative litigation.²

Plaintiffs do not consent to this extension request, stating that a timely resolution of the preliminary injunction motion is crucial to ensuring that their interests are protected while this matter continues. This is Defendants’ second request for an extension of their deadline to respond to Plaintiffs’ motion for a preliminary injunction. The Court granted Defendants’ first request, extending the deadline from April 4 to April 18, 2025.

Thank you for your attention to this matter.

¹ If the Court were to grant Defendants’ motion for a stay then Defendants’ deadline to respond to Plaintiffs’ motion for a preliminary injunction would be adjourned *sine die* while the nationwide injunctions remain in place.

² To correct an error in Defendants’ Memorandum of Law in Support of Its Motion to Stay (ECF No. 31 at 5 n.2), Defendants propose that any stay entered by this Court would automatically expire if the current nationwide injunctions are stayed, limited, or vacated.

Respectfully,

MATTHEW PODOLSKY
Acting United States Attorney for the
Southern District of New York

By: /s/ Jeffrey Oestericher
JEFFREY OESTERICH
Assistant United States Attorney
Tel.: (212) 637-2695
Email: jeffrey.oestericher@usdoj.gov